

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 09-40027-FDS

CHARLES ADAMS

**MOTION IN LIMINE REGARDING “STANDING OBJECTION”**  
**IN LIEU OF SEVERANCE**

The co-defendants in this matter have moved for severance from each other, and their defenses are somewhat antagonistic. The court has denied severance.

Now comes the defendant in this matter, and, through counsel, respectfully requests the Court enter an order recognizing a “continuing objection” to the testimony of the defendant on behalf of the two co-defendants prior to the testimony of the defendant, and outside of the hearing of the jury.

It is expected that the defendant will testify and, rather than have his testimony repeatedly interrupted with myriad objections to nearly every area of inquiry from co-counsel, as is expected, the defendant requests this order to ensure he receives a fair trial. A blizzard of objections to his testimony will disrupt the testimony, give an appearance of antagonism, and unnecessarily thwart his ability to testify fully and completely.

Dated: March 27, 2012

*/s/ Beverly B. Chorbajian*  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on March 27, 2012

*/s/ Beverly B. Chorbaian*  
BEVERLY B. CHORBAJIAN